

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CAROLINE BRODIE and JOY LEVINE,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

FEDERAL REALTY INVESTMENT TRUST,

Defendant.

Case No. 2:18-cv-00716-GAM

**STIPULATION OF DISMISSAL AND PROPOSED ORDER**

Plaintiffs Caroline Brodie and Joy Levine (“Plaintiffs”), and Defendant Federal Realty Investment Trust (“Defendant”) (collectively, the “Parties”), by and through their undersigned counsel and pursuant to Fed. R. Civ. P. 41(a)(1)(A) and Fed. R. Civ. P. 23(e), hereby stipulate to the dismissal of this action, with prejudice as to Plaintiffs’ individual claims, and without prejudice as to the claims of any alleged class members. No motion for class certification has been filed and no class has been certified in this action. Accordingly, class notice and Court approval of the settlement are not required under Fed R. Civ. P. 23(e).

In accordance with the terms of their Confidential Settlement Agreement and Release dated as of August 30, 2018 (the “Settlement Agreement”), the Parties request that the Court enter the attached Order dismissing with prejudice Plaintiffs’ individual claims and dismissing without prejudice the claims of any alleged class members, and retaining jurisdiction to interpret and enforce the terms of this Stipulation and the Settlement Agreement entered into by the Parties.

**REED SMITH LLP**

By: /s/ Roy W. Arnold

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Dated: September 5, 2018

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*Counsel for Plaintiffs  
Caroline Brodie and Joy Levine*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 4, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel or parties of record electronically by CM/ECF.

/s/ Roy W. Arnold

Roy W. Arnold